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5 Attorneys for Defendant
Clark County School District

8 UNITED STATES DISTRICT COURT
9 DISTRICT OF NEVADA

11 NICHOLAS A. LIVEING-
MACDONALD,

12 Plaintiff,

13 vs.

14 CLARK COUNTY SCHOOL DISTRICT,
15 a political subdivision of the STATE OF
NEVADA,

16 Defendant.

Case No. 2:15-cv-02433-APG-NJK

~~[PROPOSED]~~ STIPULATION AND
ORDER TO EXTEND TIME FOR
PLAINTIFF TO RESPOND TO
DEFENDANT'S PARTIAL MOTION TO
DISMISS COMPLAINT

[FIRST REQUEST]

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18 Plaintiff NICHOLAS A. LIVEING-MACDONALD and Defendant CLARK COUNTY
19 SCHOOL DISTRICT, by and through their undersigned counsel, hereby agree and stipulate to
20 extend the time for Plaintiff to respond to Defendant's Partial Motion to Dismiss Complaint [Dkt.
21 #10], from the current deadline of March 21, 2016 up to and including **March 28, 2016**.

22 Such extension is necessary because counsel for Plaintiff is currently preparing for trial in the
23 matter of *Cole Wilson v Tamara Management*, Case No. A653392 in the Eighth Judicial District
24 Court, in and for the County of Clark. The trial in that matter is scheduled to begin on March 28,
25 2016, and counsel for Plaintiff requires additional time to review, assess and respond to Defendant's
26 Partial Motion to Dismiss [Dkt. #10] and prepare for the trial at the same time.

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1 This is the first request for an extension of time for Plaintiff to respond to Defendant Partial
2 Motion to Dismiss the Complaint. This request is made in good faith and not for the purpose of
3 delay.

4 Dated: March 14, 2016

Dated: March 14, 2016

5 Respectfully submitted,

Respectfully submitted,

6
7 /s/ Michael T. Gebhart, Esq.
8 MICHAEL T. GEBHART, ESQ.



BRUCE C. YOUNG, ESQ.

9 Attorneys for Plaintiff
10 NICHOLAS A. LIVEING-MACDONALD

Attorneys for Defendant
CLARK COUNTY SCHOOL DISTRICT

11 **ORDER**

12 **IT IS SO ORDERED.**

13 Dated: March 15, 2016.

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17 UNITED STATES DISTRICT COURT JUDGE

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19 Firmwide:138658308.1 026133.1000